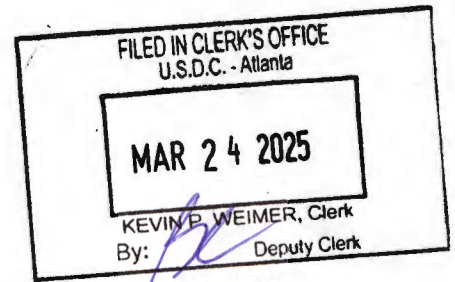


Exhibit “D”



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NATALIE SOTO,

Plaintiff,

v.

WENDELL HOLMES, JR.,

Defendant.

Civil Action No. 1:24-cv-02911-SDG

DEFENDANT'S MOTION TO AMEND DEPOSITION TESTIMONY AND STATEMENT OF FACTS

COMES NOW, Wendell Holmes Jr., the Defendant in the above-captioned case, representing myself pro se, and respectfully submits this Motion to Amend Deposition Testimony and Statement of Facts. In support of this motion, I state as follows:

I. INTRODUCTION

1. I am the Defendant in this matter, appearing without an attorney.
2. On March 20, 2025, I gave a deposition under oath.
3. During the deposition, I denied sharing a nude photograph of the Plaintiff with Dawn Douglas.
4. I now seek to amend my testimony to truthfully acknowledge that I did, in fact, share the Plaintiff's photo with Dawn Douglas.

II. STATEMENT OF FACTS

1. My previous denial of sharing the Plaintiff's photo was made under immense stress and fear of legal consequences. I was unprepared for the nature of the deposition and felt pressured, which led to my decision to lie.

2. Upon reflection, I realize the importance of providing truthful and accurate information. I am submitting this motion to correct my previous testimony and to present my full account of events.

3. The Plaintiff's attorney presented a recording during the deposition that allegedly contains my voice admitting to sharing the Plaintiff's photo with Dawn Douglas. I acknowledge that this recording may indeed be my voice.

4. Furthermore, the Plaintiff's attorney presented a document that contains two nude photos of another woman not related to this case. These photos were shared by Dawn Douglas to the Plaintiff, then from the Plaintiff to her attorney, and subsequently from her attorney to the court clerk, who then provided them to me.

5. The inappropriate sharing of this woman's photos without her consent is concerning and demonstrates the mishandling of sensitive materials by multiple parties.

III. REQUEST TO AMEND TESTIMONY

1. I respectfully request that the Court allow me to amend my deposition testimony to acknowledge that I shared the Plaintiff's photo with Dawn Douglas.

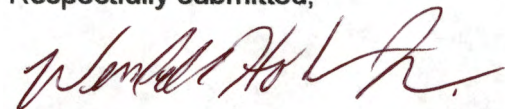
2. I also request that the Court consider the mishandling of the other woman's photos, which were shared without consent by the Plaintiff, her attorney, and the court.

3. I ask the Court to recognize that I am attempting to correct my testimony in good faith and ensure that my side of the story is accurately represented.

IV. CONCLUSION

For the reasons stated above, I respectfully ask the Court to grant this motion and allow me to amend my deposition testimony accordingly.

Respectfully submitted,



Wendell Holmes Jr.

5934 Rosie Lane SE

Mableton, GA 30126

404-664-2943

Wendellholmesjr@gmail.com

March 24, 2025

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion to Amend Deposition Testimony and Statement of Facts has been served upon the Plaintiff's attorney, Joseph Weeks, via [Certified Mail / Email], on this 24th day of March, 2025.

A handwritten signature in dark ink, appearing to read "Wendell Holmes Jr.", with a stylized flourish at the end.

Wendell Holmes Jr.